

# **Exhibit 3: Proposed Order Granting Motion to Amend**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NORTH CAROLINA A. PHILIP RANDOLPH  
INSTITUTE, and ACTION NC,

Plaintiffs,

v.

THE NORTH CAROLINA STATE BOARD OF  
ELECTIONS; DAMON CIRCOSTA, in his official  
capacity as CHAIR OF THE STATE BOARD OF  
ELECTIONS; STELLA ANDERSON, in her  
official capacity as SECRETARY OF THE STATE  
BOARD OF ELECTIONS; JEFF CARMON III, in  
his official capacity as MEMBER OF THE STATE  
BOARD OF ELECTIONS; KAREN BRINSON  
BELL, in her official capacity as EXECUTIVE  
DIRECTOR OF THE STATE BOARD OF  
ELECTIONS; and JOSH STEIN, in his official  
capacity as ATTORNEY GENERAL OF THE  
STATE OF NORTH CAROLINA,

Defendants.

Civil Action No.  
1:20-cv-00876

**[PROPOSED] ORDER GRANTING PLAINTIFFS’  
MOTION TO AMEND THE COMPLAINT**

This matter is before the Court on Plaintiffs’ Motion to Amend the Complaint. For good cause shown, Plaintiffs’ Motion is GRANTED and Defendants’ Motion to Dismiss is DENIED AS MOOT, without prejudice to Defendants refiling a subsequent motion to

dismiss pursuant to the Federal Rules of Civil Procedure and the Local Rules.

SO ORDERED this \_\_\_\_ day of December, 2020.

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HON. JOE L. WEBSTER  
UNITED STATES MAGISTRATE JUDGE